

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY**

REC'D TN  
REGULATORY AUTH.  
'99 FEB 12 PM 2 03

In re:

BellSouth Telecommunications, Inc. Tariff                     )  
To Introduce Area Plus Services Which Provide            )  
LATA-Wide Local Calling Area for Residential            )  
Customers

OFFICE OF THE  
EXECUTIVE SECRETARY

Docket No. 98-00634

**MOTION TO INTERVENE**  
**OF SPRINT COMMUNICATIONS COMPANY L.P.**

COMES NOW Sprint Communications Company L.P. ("Sprint"), pursuant to T.C.A. Sec. 4-5-310, and hereby petitions the Tennessee Regulatory Authority ("Authority") for leave to intervene and participate as a party in the above-captioned tariff proposed by BellSouth Telecommunications, Inc. ("BellSouth"). In support of this Motion, Sprint states as follows:

1. Sprint is authorized to provide interexchange and competitive local exchange service in the State of Tennessee.

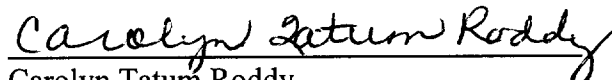
2. Sprint's ability to offer intraLATA toll service and local exchange service in competition with BellSouth will be directly impacted by the tariff proposed in the above-stated Docket. BellSouth's tariff in Docket No. 98-00634 proposes to offer Area Plus services that provide LATAwide local calling area for residential customers for a monthly rate. This proposed service discriminates among BellSouth's customers and

will erect obstacles to competition for Sprint.

3. Accordingly, Sprint requests that it be granted leave to intervene and participate fully as a party in this Docket. Sprint's participation will allow it to present issues and develop facts that will assist the Authority in considering the potential impact of the BellSouth proposal. Sprint's intervention and participation as a party will not delay or in any way hinder the handling of this Docket.

WHEREFORE, in view of the foregoing, Sprint respectfully requests that it be granted leave to intervene and participate fully as a party of record.

Respectfully submitted this 10th day of February, 1999.

  
Carolyn Tatum Roddy  
Sprint Communications Company L.P.  
3100 Cumberland Circle- GAATLNO802  
Atlanta, Georgia 30339  
(404) 649-6788

Its Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the Motion to Intervene of Sprint Communications Company L.P. in Docket No. 98-00634 has been served by United States First Class Mail, postage prepaid upon the following:

James P. Lamoureux  
AT&T  
1200 Peachtree St., NE, #4068  
Atlanta, GA 30367

Vincent Williams, Esquire  
Consumer Advocate Division  
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Jon E. Hastings, Esquire  
Boult, Cummings, et al.  
P.O. Box 198062  
Nashville, TN 37219-8062

Guy Hicks  
BellSouth Telecommunications Inc.  
Suite 2101  
333 Commerce Street  
Nashville, TN 37201-3300

This 10th day of February, 1999.

A handwritten signature in cursive script that reads "Danielle Etzbach". The signature is written in black ink and is positioned above the printed name and title.

Danielle Etzbach  
Sprint Communications Company L.P.  
External Affairs